

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SHARKNINJA OPERATING LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 19-1935 (CFC)
)	
IROBOT CORPORATION,)	
)	
Defendant.)	

**DECLARATION OF JACK B. BLUMENFELD IN SUPPORT OF
SHARKNINJA'S MOTION TO ENJOIN DUPLICATIVE LITIGATION**

I, Jack B. Blumenfeld, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of Delaware. I am a partner in the law firm of Morris, Nichols, Arsht & Tunnell LLP, counsel for Plaintiff SharkNinja Operating LLC ("SharkNinja"). I submit this declaration in support of SharkNinja's motion to enjoin pending, parallel litigation in the District of Massachusetts.

2. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Ms. Tonya Drake, Assistant General Counsel to iRobot Corporation, sent to SharkNinja on October 7, 2019.

3. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Tim Johnston, Associate General Counsel to SharkNinja, sent to Ms. Drake on October 11, 2019.

4. Attached hereto as Exhibit 3 is a true and correct copy of the complaint filed in *iRobot Corporation v. SharkNinja Operating LLC, et al.*, Civ. No. 1:19-cv-12125-ADB, in the United States District Court for the District of Massachusetts, filed on October 15, 2019

5. Attached hereto as Exhibit 4 is a true and correct copy of a letter from Gregg F. LoCascio, counsel for iRobot Corporation, sent to counsel for SharkNinja on October 15, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 18, 2019, in Wilmington, Delaware

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 18, 2019, upon the following in the manner indicated:

Gregg F. LoCascio Esquire
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Attorneys for Defendant

VIA ELECTRONIC MAIL

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)